

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

In re: § Chapter 11  
KRISJENN RANCH, LLC, §  
*Debtor* §  
§ Case No. 20-50805  
§

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KRISJENN RANCH, LLC and §  
KRISJENN RANCH, LLC-SERIES §  
UVALDE RANCH, and KRISJENN §  
RANCH, LLC-SERIES PIPELINE §  
ROW as successors in interest to §  
BLACK DUCK PROPERTIES, LLC, §  
*Plaintiffs* §

v. §  
§  
§

DMA PROPERTIES, INC., and §  
LONGBRANCH ENERGY, LP, §  
*Defendants* §

Adversary No. 20-05027

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DMA PROPERTIES, INC, §  
*Cross-Plaintiff/Third Party Plaintiff* §  
§

v. §  
§  
§

KRISJENN RANCH, LLC, §  
KRISJENN RANCH, LLC-SERIES §  
UVALDE RANCH, and KRISJENN §  
RANCH, LLC-SERIES PIPELINE ROW, §  
BLACK DUCK PROPERTIES, LLC, §  
LARRY WRIGHT, and JOHN TERRILL, §  
*Cross-Defendants/Third-Party* §  
*Defendants* §

Adversary No. 20-05027

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KRISJENN RANCH, LLC, KRISJENN RANCH, LLC-SERIES UVALDE RANCH,  
AND KRISJENN RANCH, LLC-SERIES PIPELINE ROW, AS SUCCESSORS IN  
INTEREST TO BLACK DUCK PROPERTIES, LLC'S MOTION TO COMPEL  
DISCOVERY RESPONSES FROM DMA PROPERTIES, INC.,  
FRANK DANIEL MOORE, AND LONGBRANCH ENERGY, LP

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**DEBTORS HAVE REQUESTED EXPEDITED CONSIDERATION OF THIS OBJECTION AND HAS REQUESTED THAT A HEARING BE HELD ON THIS OBJECTION AT THE COURT'S EARLIEST CONVENIENCE. IF THE COURT IN FACT SETS THIS OBJECTION FOR AN EXPEDITED HEARING, THEN ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS**  
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**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

COME NOW Debtors, Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row (collectively the “Debtors”), and submit this Motion Requesting Expedited Consideration of Debtor’s Motion to Compel Discovery Responses to the Debtors’ Written Discovery Requests to DMA Properties, Inc. (“DMA”), Frank Daniel Moore (“Moore”), and Longbranch Energy, LP (“Longbranch”) and the oral testimony of Longbranch (the “Motion”), and in support thereof respectfully shows the Court as follows:

1. This case is presently set for trial on January 11, 2021.
2. DMA, Moore, and Longbranch have engaged in clear instances of discovery abuse including but not limited to violating a court order to withdraw objections, withholding documents, refusing to testify as to non-privileged communications, and making secret deals with non-parties in an effort to conduct a trial by ambush.
3. In an effort to ensure they are adequately prepared for trial, Debtors have filed their Motion to Compel Discovery Responses to the Debtors’ Written Discovery Requests to DMA Properties, Inc., Frank Daniel Moore, and Longbranch Energy, LP. Dkt. No. 190.
4. Debtors now request expedited consideration of their Motion to Compel Discovery Responses to the Debtors’ Written Discovery Requests to DMA Properties, Inc., Frank Daniel Moore, and Longbranch Energy, LP. Having this matter heard before the Court closes for the holidays is vital to ensuring that Debtors have adequate time to prepare for trial.

WHEREFORE PREMISES CONSIDERED, Debtors respectfully request that the Court grant this request and set their Motion to Compel Discovery Responses to the Debtors' Written Discovery Requests to DMA Properties, Inc., Frank Daniel Moore, and Longbranch Energy, LP. to be heard at the Court's earliest convenience.

Dated: December 18, 2020

Respectfully submitted,

MULLER SMEBERG, PLLC

By: /s/ John Muller  
C. John Muller IV  
State Bar No. 24070306  
[john@muller-smeberg.com](mailto:john@muller-smeberg.com)  
Ezekiel J. Perez  
State Bar No. 24096782  
[zeke@muller-smeberg.com](mailto:zeke@muller-smeberg.com)  
111 W. Sunset Rd.  
San Antonio, TX 78209  
Telephone: 210-664-5000  
Facsimile: 210-598-7357

ATTORNEY FOR DEBTORS

**CERTIFICATE OF CONFERENCE**

I hereby certify that on December 16, 2020 I conferred with counsel for DMA Properties, Inc. and LongBranch Energy, LP on the record about the expedited request for relief requested in this motion. Upon such conference, counsel has indicated that they are not opposed to the relief requested sought.

/s/ John Muller  
C. John Muller IV

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 18th day of December 2020:

Michael Black  
BURNS & BLACK PLLC  
750 Rittiman Road  
San Antonio, Texas 78209  
210-829-2022  
210-829-2021 fax  
[mblack@burnsandblack.com](mailto:mblack@burnsandblack.com)  
Attorneys for Longbranch Energy, LP  
and DMA Properties, Inc.

Christopher S. Johns  
Christen Mason Hebert  
JOHNS & COUNSEL PLLC  
14101 Highway 290 West, Suite  
400A  
Austin, Texas 78737  
512-399-3150  
512-572-8005 fax  
[cjohns@johnsandcounsel.com](mailto:cjohns@johnsandcounsel.com)  
[chebert@johnsandcounsel.com](mailto:chebert@johnsandcounsel.com)

Timothy Cleveland  
CLEVELAND | TERRAZAS PLLC  
4611 Bee Cave Road, Suite 306B  
Austin, Texas 78746  
512-689-8698  
[tcleveland@clevelandterrazas.com](mailto:tcleveland@clevelandterrazas.com)  
Attorneys for DMA Properties, Inc.

Natalie Wilson  
ANGLEY & BANACK, INC.  
745 East Mulberry Avenue | Suite 700  
San Antonio, TX 78212  
210-736-6600  
[lwilson@langleybanack.com](mailto:lwilson@langleybanack.com)  
Attorneys for DMA Properties, Inc.

Jeffery Duke  
DUKE BANISTER MILLER & MILLER  
22310 Grand Corner Drive, Suite 110  
Katy, Texas 77494  
[jduke@dbmmlaw.com](mailto:jduke@dbmmlaw.com)  
Counsel for Longbranch Energy, LP

William Germany  
BAYNE, SNELL, & KRAUSE  
1250 NE Loop 410, Ste. 725  
San Antonio, Texas 78209  
T- (210) 824-3278  
F- (210) 824-3937  
[wgermany@bskaw.net](mailto:wgermany@bskaw.net)  
Attorney for Larry Wright

OFFICE OF THE UNITED STATES  
TRUSTEE  
903 San Jacinto Blvd, Room 230  
Austin, Texas 78701  
[shane.p.tobin@usdoj.gov](mailto:shane.p.tobin@usdoj.gov)  
United States Trustee

/s/ John Muller  
C. John Muller IV